

Niche Education LTD

Data Protection Policy

Company: Niche Education LTD

Company Number: 12685987

Policy Title: Data Protection Policy

Legislation: UK GDPR and Data Protection Act 2018

Policy Owner: Niche Education LTD Management

Effective Date: August 2026

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1. Policy Statement

Niche Education LTD is committed to protecting the privacy, confidentiality and security of all personal information that it collects, processes, stores and shares.

As an education recruitment and supply teaching agency, Niche Education LTD processes personal information relating to candidates, employees, workers, clients, schools, pupils and other individuals. The Company recognises the importance of ensuring that personal information is handled lawfully, fairly, transparently and securely.

Niche Education LTD will comply with all applicable data protection legislation, including the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, together with any subsequent amendments or applicable legislation.

The Company will ensure that all processing of personal data is carried out in accordance with the seven data protection principles.

The seven principles are:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality (security)
7. Accountability

These principles form the foundation of Niche Education LTD's approach to data protection. The ICO confirms that organisations must be able to demonstrate their compliance with these principles.

2. Purpose of this Policy

The purpose of this policy is to:

- Explain how Niche Education LTD protects personal data.
 - Ensure compliance with UK data protection legislation.
 - Establish clear responsibilities for employees and workers handling personal information.
 - Ensure personal data is processed lawfully, fairly and transparently.
 - Protect personal information against unauthorised access, loss, misuse, alteration or disclosure.
 - Ensure individuals understand their rights in relation to their personal information.
 - Provide procedures for responding to data protection requests and breaches.
 - Demonstrate the Company's accountability for its data protection responsibilities.
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3. Scope

This policy applies to all directors, employees, temporary workers, consultants, contractors and other individuals acting on behalf of Niche Education LTD who have access to personal information.

It applies to personal data held in:

- Electronic systems.
- Recruitment databases.
- Applicant tracking systems.
- Email accounts.
- Microsoft 365 systems.
- Cloud-based systems.
- Paper files.
- Personnel records.
- Candidate records.
- Client records.
- Payroll records.
- Timesheets.
- DBS and safeguarding information.
- References.

- Training records.
- Compliance records.
- Marketing databases.
- Telephone and communication records.

The policy applies whether information is processed within the Company's offices, remotely or through third-party service providers.

4. Definitions

Personal Data

Personal data is information relating to an identified or identifiable individual.

Examples include:

- Name.
- Address.
- Telephone number.
- Email address.
- Date of birth.
- National Insurance number.
- Employment history.
- Qualifications.
- References.
- DBS information.
- Bank details.
- Payroll information.
- Identification documents.
- IP addresses and other online identifiers.

Special Category Data

Special category data includes information requiring additional protection, such as information concerning:

- Health.
- Disability.
- Racial or ethnic origin.
- Religious or philosophical beliefs.

- Trade union membership.
- Genetic or biometric information where used for identification.
- Sex life or sexual orientation.

Niche Education LTD will only process special category data where an appropriate lawful basis and additional condition under data protection legislation applies.

Processing

Processing includes collecting, recording, storing, organising, using, sharing, altering, retrieving and deleting personal data.

Data Subject

A data subject is the individual to whom personal data relates.

Data Controller

A data controller determines how and why personal data is processed.

Data Processor

A data processor processes personal data on behalf of a data controller.

5. The Seven Data Protection Principles

Principle 1 – Lawfulness, Fairness and Transparency

Niche Education LTD will process personal information lawfully, fairly and transparently.

Before collecting or processing personal information, the Company will identify an appropriate lawful basis.

The six principal lawful bases under the UK GDPR include:

- Consent.
- Contract.
- Legal obligation.
- Vital interests.
- Public task.
- Legitimate interests.

The Company will determine the appropriate lawful basis according to the purpose of processing.

For example, personal information may be processed where it is necessary to:

- Recruit and place candidates into employment.
- Enter into or perform contracts.
- Comply with legal obligations.
- Complete payroll and financial administration.
- Conduct necessary employment checks.
- Meet safeguarding and regulatory requirements.
- Maintain appropriate recruitment records.
- Communicate with clients and candidates.

Where consent is relied upon, Niche Education LTD will ensure that consent is freely given, specific, informed and capable of being withdrawn.

Where special category or criminal offence information is processed, the Company will identify the relevant additional legal condition before processing takes place.

The Company will provide appropriate privacy information to individuals explaining:

- What information is collected.
- Why it is collected.
- How it is used.
- The lawful basis for processing.
- Who information may be shared with.
- How long information will be retained.
- The individual's rights.
- How individuals can contact the Company regarding their information.

Niche Education LTD will not deliberately mislead individuals about how their personal data is being used.

The ICO states that organisations must be clear, open and honest with individuals about how their personal data is used.

6. Principle 2 – Purpose Limitation

Niche Education LTD will only collect and process personal information for specified, explicit and legitimate purposes.

Personal data will not be subsequently used for unrelated purposes unless the new processing is permitted under data protection legislation.

For example, candidate information collected for recruitment and placement purposes will not automatically be used for unrelated marketing purposes.

The Company will:

- Clearly identify the purpose for collecting information.
- Inform individuals about those purposes.
- Only use information for compatible purposes.
- Review proposed new uses of existing information.
- Identify an appropriate lawful basis before undertaking new processing.
- Maintain appropriate records of processing activities.

Where a new purpose is materially different from the original purpose, Niche Education LTD will assess whether further processing is lawful and whether additional privacy information or another lawful basis is required.

The ICO confirms that organisations should be clear from the outset about why personal information is being collected and must ensure subsequent use is compatible with the original purpose.

7. Principle 3 – Data Minimisation

Niche Education LTD will ensure that personal information collected is:

- Adequate.
- Relevant.
- Limited to what is necessary.

The Company will not routinely collect excessive personal information.

For example, recruitment and compliance teams will only request information that is reasonably necessary to:

- Establish a candidate's identity.
- Assess suitability for employment.
- Complete recruitment checks.
- Meet safeguarding requirements.
- Meet legal or regulatory requirements.
- Arrange employment or assignments.
- Process payroll.
- Maintain appropriate records.

Employees will be instructed not to request or retain unnecessary personal information.

Where information is no longer required for a legitimate purpose, it will be securely deleted or destroyed in accordance with the Company's retention procedures.

8. Principle 4 – Accuracy

Niche Education LTD will take reasonable steps to ensure that personal information is accurate and, where necessary, kept up to date.

Employees must take reasonable care when entering or updating information.

The Company will:

- Provide individuals with opportunities to update their information.
- Correct inaccurate information without undue delay.
- Investigate information identified as inaccurate.
- Ensure candidate records are reviewed where appropriate.
- Maintain accurate compliance and safeguarding records.
- Ensure information provided to clients is accurate and appropriate.

Employees must notify management if they identify inaccurate or potentially misleading personal information.

Individuals may also exercise their right to request rectification of inaccurate personal information.

The ICO states that organisations should take reasonable steps to ensure personal information is not incorrect or misleading.

9. Principle 5 – Storage Limitation

Niche Education LTD will not retain personal information for longer than is necessary for the purpose for which it was collected.

The Company will maintain a **Data Retention and Disposal Schedule** setting out appropriate retention periods for different categories of information.

Retention periods will take account of:

- Legal requirements.
- Regulatory requirements.

- Contractual requirements.
- Recruitment requirements.
- Safeguarding requirements.
- Financial requirements.
- Potential disputes or legal claims.
- The ongoing relationship with the individual.

When personal information reaches the end of its retention period, it will be securely:

- Deleted.
- Destroyed.
- Anonymised where appropriate.

Paper records containing personal data will be securely destroyed rather than placed in ordinary waste.

Electronic information will be securely deleted from relevant systems where practicable.

Backups will be managed appropriately and retained in accordance with the Company's IT and data retention arrangements.

10. Principle 6 – Integrity and Confidentiality (Security)

Niche Education LTD will implement appropriate technical and organisational measures to protect personal data against:

- Unauthorised access.
- Unauthorised disclosure.
- Accidental loss.
- Destruction.
- Damage.
- Unauthorised alteration.
- Cybersecurity threats.
- Malware and phishing.
- Theft or misuse.

Security measures may include:

- Password-protected systems.
- Strong and unique passwords.
- Multi-factor authentication where available and appropriate.

- Access controls.
- Role-based permissions.
- Secure cloud systems.
- Antivirus and anti-malware protection.
- Firewall protection.
- Security updates.
- Encryption where appropriate.
- Secure backups.
- Secure disposal of documents.
- Locked storage facilities.
- Staff data protection training.
- Confidentiality obligations.
- Restricted access to sensitive information.

Employees must only access personal information that they require for their role.

Personal information must not be:

- Shared with unauthorised individuals.
- Stored on unauthorised devices.
- Sent to personal email accounts.
- Left unattended in public areas.
- Discussed where it may be overheard by unauthorised individuals.

Where personal information is sent by email, employees must take reasonable steps to ensure that it is sent to the correct recipient.

Particular care will be taken when transmitting sensitive information, including safeguarding, DBS, health or special category information.

11. Principle 7 – Accountability

Niche Education LTD accepts responsibility for complying with data protection legislation and will be able to demonstrate compliance.

The Company will maintain appropriate documentation and procedures, which may include:

- This Data Protection Policy.
- Privacy Notices.
- Data Retention and Disposal Schedule.

- Data Breach Procedure.
- Data Subject Access Request Procedure.
- Records of Processing Activities where required.
- Data Protection Impact Assessments where required.
- Appropriate contracts with data processors.
- Staff confidentiality arrangements.
- Data protection training records.
- Information security procedures.
- Data breach records.
- Data sharing agreements where appropriate.
- Records demonstrating compliance.

The Company will regularly review its data protection arrangements and update policies and procedures where necessary.

Accountability is an ongoing responsibility rather than a one-off exercise. The ICO confirms that organisations must have appropriate measures and records in place to demonstrate compliance.

12. Responsibilities

Directors and Management

Niche Education LTD's directors and management are responsible for ensuring that:

- Appropriate data protection policies are implemented.
- Employees understand their responsibilities.
- Appropriate security measures are maintained.
- Data breaches are investigated.
- Data protection risks are considered when introducing new systems or processes.
- Third-party processors are appropriately assessed.
- Data protection compliance is periodically reviewed.

Employees and Workers

All employees and workers are responsible for:

- Following this policy.
- Keeping personal data confidential.
- Only accessing information required for their role.

- Using Company systems appropriately.
- Reporting suspected breaches immediately.
- Keeping passwords secure.
- Completing required data protection training.
- Following data retention procedures.
- Not sharing information with unauthorised individuals.

Failure to comply with this policy may result in disciplinary action.

13. Data Subject Rights

Niche Education LTD recognises the rights individuals have under applicable data protection legislation.

Depending on the circumstances, individuals may have rights relating to:

- Being informed about processing.
- Accessing their personal data.
- Rectifying inaccurate data.
- Erasing personal data.
- Restricting processing.
- Data portability.
- Objecting to processing.
- Rights relating to automated decision-making and profiling.

Requests relating to personal data will be handled promptly and in accordance with applicable statutory requirements.

The Company will verify the identity of the requester where reasonably necessary before disclosing personal information.

14. Data Protection by Design and Default

Niche Education LTD will consider data protection and privacy when introducing new systems, processes or services involving personal information.

The Company will consider:

- What information is required.
- Why it is required.

- Who needs access.
- How information will be protected.
- How long information will be retained.
- Whether processing creates risks to individuals.
- Whether additional safeguards are required.

Where processing is likely to result in a high risk to individuals, the Company will consider whether a **Data Protection Impact Assessment (DPIA)** is required.

15. Data Sharing

Niche Education LTD may need to share personal information with third parties where there is a lawful basis to do so.

Potential recipients may include:

- Schools and education providers.
- Clients and prospective clients.
- Payroll providers.
- Pension providers.
- Accountants.
- IT and software providers.
- Background checking and DBS-related providers.
- Professional advisers.
- Government departments.
- Regulatory authorities.
- Law enforcement agencies where legally required.

Before sharing information, Niche Education LTD will consider:

1. Whether the sharing is necessary.
2. Whether there is a lawful basis.
3. Whether the recipient is authorised to receive the information.
4. Whether only necessary information is being shared.
5. Whether appropriate security arrangements are in place.

Where a third-party organisation processes information on behalf of Niche Education LTD, the Company will ensure that appropriate contractual arrangements are in place.

16. Recruitment and Candidate Information

Due to the nature of Niche Education LTD's business, the Company processes significant amounts of candidate information.

Candidate information may include:

- Contact information.
- Employment history.
- Qualifications.
- References.
- Right-to-work information.
- Identification documents.
- DBS and safeguarding information.
- Training records.
- Professional registration information.
- Information relating to suitability for particular roles.
- Relevant health or disability information where lawfully required.
- Other information required to satisfy legal, contractual or safeguarding obligations.

Candidate information will only be collected and processed where necessary and appropriate.

Information will be securely stored and access will be restricted to authorised personnel.

Information provided to schools and clients will be limited to information that is relevant and necessary for the recruitment or placement process.

17. Confidentiality

All employees are expected to maintain confidentiality regarding personal information.

Confidential information must not be discussed outside the Company's authorised business processes.

Employees must exercise particular care when discussing candidates, workers, pupils or clients.

Confidential information must not be disclosed to friends, family members, other candidates, unauthorised clients or members of the public.

18. Personal Data Breaches

A personal data breach may include:

- Sending personal information to the wrong person.
- Losing a laptop or mobile device.
- Losing paperwork containing personal information.
- Unauthorised access to a system.
- Hacking or malware.
- Accidental disclosure.
- Theft of personal information.
- Unauthorised alteration or deletion.
- Phishing or compromised accounts.

All suspected personal data breaches must be reported to management immediately.

Niche Education LTD will assess the nature and severity of the breach and determine whether notification to the Information Commissioner's Office (ICO) or affected individuals is required.

Where a breach is reportable, the Company will comply with the applicable statutory reporting requirements. The ICO notes that certain personal data breaches must be reported within 72 hours of becoming aware of them.

The Company will maintain appropriate records of data breaches and the actions taken.

19. Staff Training

Niche Education LTD will ensure that employees who handle personal information receive appropriate data protection awareness and training.

Training may cover:

- UK GDPR and the Data Protection Act 2018.
- The seven data protection principles.
- Confidentiality.
- Password security.
- Phishing and cyber security.
- Secure email use.
- Data breaches.
- Data subject rights.

- Handling special category information.
- Secure disposal of information.

Training will be refreshed periodically and when significant changes to data protection requirements occur.

Training records will be maintained as evidence of compliance.

20. Information Security

Niche Education LTD will maintain appropriate technical and organisational security measures.

These measures will be reviewed periodically and following significant changes to systems, processes or identified risks.

Access to systems will be provided according to business need.

Where employees leave the organisation, access to Company systems and information will be removed or disabled promptly.

The Company will take reasonable steps to ensure that devices and software are maintained with appropriate security updates.

21. Monitoring and Review

Niche Education LTD will monitor compliance with this policy through:

- Management reviews.
- Internal checks.
- Training records.
- Data protection audits.
- Review of data breaches.
- Review of access permissions.
- Review of retention arrangements.
- Review of supplier and processor arrangements.
- Review of relevant legislation and ICO guidance.

This policy will be reviewed at least annually or sooner where there are significant changes to legislation, guidance, business operations or identified risks.

The ICO's guidance on accountability emphasises that data protection measures should be reviewed and updated on an ongoing basis.

22. Non-Compliance

Failure to comply with this policy may expose Niche Education LTD and individuals to significant risks, including:

- Regulatory enforcement.
- Financial penalties.
- Legal claims.
- Reputational damage.
- Loss of client confidence.
- Loss of candidate confidence.
- Potential disciplinary action.

Any suspected non-compliance will be investigated and appropriate corrective action will be taken.

23. Related Policies and Procedures

This policy should be read alongside the Company's other policies and procedures, including:

- Privacy Notice.
 - Data Retention and Disposal Policy.
 - Data Breach Procedure.
 - Information Security Policy.
 - Recruitment, Selection and Vetting Policy.
 - Confidentiality Policy.
 - Complaints Procedure.
 - Subject Access Request Procedure.
 - Cyber Security Policy.
 - Records Management Procedures.
 - Equality, Diversity and Inclusion Policy.
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24. Policy Approval

This policy has been approved by Niche Education LTD management and applies to all employees, workers and other authorised persons handling personal information on behalf of the Company.

Approved by: Niche Education LTD Management

Date: _____

Signature: _____

Policy Review Date: _____

Version: 1.0

Appendix 1 – Data Protection Principles Compliance Summary

Principle	Niche Education LTD's Approach
1. Lawfulness, fairness and transparency	Personal information is processed using an appropriate lawful basis and individuals are provided with clear privacy information.
2. Purpose limitation	Information is collected for specified and legitimate purposes and is not used for incompatible purposes.
3. Data minimisation	Only information that is adequate, relevant and necessary is collected and processed.
4. Accuracy	Records are kept accurate and individuals can request correction of inaccurate information.
5. Storage limitation	Information is retained only for as long as necessary and securely deleted or destroyed when no longer required.
6. Integrity and confidentiality	Appropriate technical and organisational security measures protect personal information from unauthorised access, loss, damage or disclosure.
7. Accountability	The Company maintains policies, procedures, training, records and evidence to demonstrate compliance.

Appendix 2 – Management Commitment

Niche Education LTD recognises that effective data protection is particularly important within the education recruitment sector because the Company handles personal and potentially sensitive information relating to candidates, workers, clients and other individuals.

The Company therefore commits to maintaining a culture in which data protection is treated as an ongoing business responsibility rather than solely an administrative or compliance requirement.

All personnel are expected to protect personal information and immediately report any suspected loss, unauthorised disclosure, misuse or security incident.

Niche Education LTD will continue to review and improve its data protection arrangements to ensure that personal information is handled responsibly, securely and in accordance with applicable legislation.